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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
DISCOVERY LETTER BRIEF**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Discovery Letter Brief ("Letter").

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Discovery Letter Brief ("Letter")	Highlighted Portions	Plaintiff (Green)

3. The green-highlighted portions of the Letter contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6).

4. Defendants do not believe the green-highlighted portions of the Letter merit sealing, but Waymo designated this material "Highly Confidential – Attorneys' Eyes Only." Defendants file this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to Local Rule 79-5.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of December, 2017 at Washington, District of Columbia

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: December 20, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ